UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA))	
V.)	G: N. 05 10010 P.GO
DANIEL W. McELROY, et al., defendants.)	Crim. No. 05-10019-RGS
defendants.)	

UNITED STATES' MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANTS' MOTIONS (ASSENTED TO)

The United States, by its undersigned counsel, hereby requests an enlargement of time, until October 7, 2005, in which to file its responses to defendants' pending discovery motions (Dkt. ##49 & 51).

The United States' responses are currently due on September 12, 2005. The requested additional time is needed to allow undersigned counsel sufficient opportunity to prepare responses to the pending motions, in light of counsel's other obligations. Specifically, undersigned counsel is scheduled to commence trial on September 6, 2005, in the case of <u>United States v. Steven A. Milkiewicz</u>, Crim. No. 04-10339-PJB/ NH CR04-213-01-PB (Hon. Paul Barbadoro, D. N.H., sitting by designation).

Undersigned counsel has conferred with counsel for the defendants and is informed that they assent to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

dated: September 2, 2005

By: /s/ Paul G. Levenson
PAUL G. LEVENSON
Assistant U.S. Attorney
John Joseph Moakley United States Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3147